

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

**DAVID DARRIGAN & DAR-JKTA
ENTERPRISES, LLC**
Plaintiffs,

v.

**KAVA CULTURE FRANCHISE
GROUP CORPORATION**
Defendant.

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CIVIL ACTION No.: 4:23-cv-00360

DISTRICT JUDGE SEAN D. JORDAN

REPLY DECLARATION OF EVAN M. GOLDMAN

I, EVAN M. GOLDMAN, declare as follows:

1. I am an attorney-at-law and a partner at the law firm of Greenspoon Marder LLP. I am admitted to practice in the States of New Jersey and New York, the Commonwealth of Pennsylvania, and the District of Columbia. I am also admitted in eleven federal district courts and four federal courts of appeal. I am admitted in this case *pro hac vice*, and have represented Kava Culture Franchise Group Corp., in its dispute with Plaintiffs – and others – since April 2023. As such, I have personal knowledge of the facts and events described herein.

2. Attached hereto and incorporated herein as Exhibit G is a true and correct copy of the Order Directing the Parties to Mediation, dated July 5, 2023, filed in the matter of *Kava Culture Franchise Grp. Corp. v. Dar-Jkta Enter, LLC*, in the Circuit Court of the Twentieth Judicial District in and for Lee County, Florida, under Case No. 23-CA-6682 (the “Florida State Action”).

3. Attached hereto and incorporated herein as Exhibit H is a true and correct copy of the Order “Denying Plaintiff’s Motion for Temporary Injunction,” dated July 5, 2023, filed in the Florida State Action.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 7, 2023

/s/ Evan M. Goldman
Evan M. Goldman